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**UNITED STATES BANKRUPTCY COURT  
 SOUTHERN DISTRICT OF NEW YORK**

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 In re : Chapter 11 Case No.  
 ENRON CREDITORS RECOVERY CORP., : 01-16034 (AJG)  
 f/k/a Enron Corp., et al., : Jointly Administered  
 Reorganized Debtors. :  
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**REORGANIZED DEBTORS' COUNTER-DESIGNATION OF RECORD  
 WITH RESPECT TO CHOCTAW/ZEPHYRUS LENDERS' STATEMENT OF ISSUES  
AND DESIGNATION OF RECORD ON APPEAL**

Enron Creditors Recovery Corp. f/k/a Enron Corp. and its affiliated reorganized debtor entities (collectively, the “Reorganized Debtors”) hereby respond to the Statement of Issues and Designation of Record on Appeal filed by Credit Suisse First Boston, Deutschebank Trust Company America, Farallon Capital Management, LLC, Goldman Sachs Credit Partners, L.P., King Street Capital L.P., Redwood Partners, and Silver Point Capital L.P., on behalf of themselves and/or funds and accounts managed or controlled by them (collectively, the “Choctaw/Zephyrus Lenders”) (Docket No. 31214), and respectfully submit as follows:

**COUNTER-DESIGNATION OF RECORD**

The Reorganized Debtors counter-designate the following items for the record (attached hereto as Exhibits 1-2):

Exhibit No.	Docket No.	Description
1.	N/A	Letter from Sylvia A. Mayer to the chambers of the Honorable Arthur J. Gonzalez, dated April 3, 2007, with enclosures.
2.	25124	Order, dated April 12, 2005, further modifying orders authorizing and approving (A) the execution, delivery and performance of (1) settlement agreement with respect to Choctaw Transactions and Zephyrus Transactions, (2) liquidation agreement with respect to Cherokee Finance V.O.F. i.1., and (3) redemption agreement with respect to Enron Finance Partners, LLC, and (B) the consummation of the transactions contemplated thereby.

Dated: New York, New York  
 September 4, 2007

By: /s/ Sylvia A. Mayer  
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